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Attorneys for Plaintiff LARRY JUNKER

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

LARRY G. JUNKER	§	
	§	
Plaintiff,	§	CIVIL ACTION NO. 3:07-cv-5094
	§	
v.	§	
	§	
HDC CORPORATION	§	JURY TRIAL DEMANDED
	§	
Defendant.	§	
	§	
	§	

**SUPPLEMENTAL DECLARATION OF
JAMES D. PETRUZZI IN SUPPORT OF
REQUEST FOR DEFAULT JUDGMENT**

I, James D. Petruzzi declare:

1. I am an attorney licensed to practice law in the State of Texas and am admitted before this Court as attorney of record for Plaintiff Larry G. Junker. I know the following facts of my own personal knowledge, and if called upon, would and could competently testify thereto.

2. Attached here as Exhibit D is a true and correct copy of design patent D450, 839 issued to Plaintiff Larry Junker on November 20, 2001. The patent covers the ornamental design of a pull-apart sheath introducer used in facilitating the insertion of catheters and other ports into the body.

3. Attached hereto as Exhibit E is a true and correct copy of the 2002 order sheet used by Defendant HDC Corporation ("HDC") for the sale of products including the Introducer Kits, and the Chemo Cath products. This was obtained from an archive of internet pages maintained by Internet Archive Waybackmachine at www.archive.org. The date of the website page was November 21, 2002, the approximate time period during which sales of the Introducer kits sold by HDC were taking place. The product offering shows that even though the peel-away sheath may be sold separately as seen on page 2 of the exhibit, the Introducer Kits and all its contents are only sold as a unit as shown on page 6 of the exhibit.

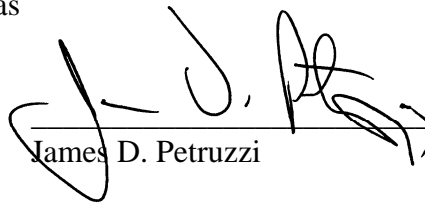
4. In an earlier ordering page from 1999, the Introducer Kit included an instruction manual, needle and guidewire none of which are sold separately. Attached hereto as Exhibit F is a true and correct copy of the 1999 ordering page. The needle and guidewire are used with the introducer sheath to introduce into the body the Chemo-Cath and Chemo-Port items referred to in Mr. Duvall's email of October 10, 2008. The Introducer Kit is useless without the introducer sheath which includes the patented handle design as it is the mechanism which permits introduction of the catheter and then removal of the introducer by peeling back the sheath and pulling it apart at the handle.

5. The entire market value rule "allows recovery based on the value of an entire mechanism, even though only one of several features is patented, where the entire market

value of the total mechanism is attributable to the patented feature. See *Crosby Steam Gage and Valve Co. v. Consolidated Safety Valve Co.*, 141 U.S. 441, 35 L. Ed. 809, 12 S. Ct. 49 (1891); *American Safety Table Co. v. Schreiber*, 415 F.2d 373, 377 (2d Cir. 1969), *cert. denied*, 396 U.S. 1038, 24 L. Ed. 2d 682, 90 S. Ct. 683 (1970); *Paper Converting Machine Co. v. FMC Corp.*, 432 F. Supp. 907, 913 (E.D. Wis. 1977), *aff'd mem.*, 588 F.2d 832 (7th Cir. 1978).” *Signode Corp. v. Weld-Loc Systems, Inc.*, 700 F.2d 1108, 1113-1114 (7th Cir. Ill. 1983) “In these cases, and in others that apply the entire market value rule, the patented feature was part of a larger mechanism, and the mechanism without the patented feature had little or no market value.” *Id.*

6. The patented introducer sheath is part of the Introducer Kit and the kit has no value without the sheath. There is no evidence that HDC sells the individual kit items separately, and importantly, it only sells the kit with the introducer sheath included. Clearly, the patented sheath is the key component in the kit and the entire market rule applies.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 9th day of July, 2008 at Houston, Texas


James D. Petruzzi

(12) **United States Design Patent** (10) **Patent No.:** **US D450,839 S**
Junker (45) **Date of Patent:** **** Nov. 20, 2001**

(54) **HANDLE FOR INTRODUCER SHEATH**

6,083,207 * 7/2000 Heck 604/164

(76) Inventor: **Larry G. Junker**, 8930 Roam La. East,
Inverness, FL (US) 34450

FOREIGN PATENT DOCUMENTS

3834600 6/1992 (DE) .

(**) Term: **14 Years**

* cited by examiner

(21) Appl. No.: **29/118,289**

Primary Examiner—Ian Simmons

(22) Filed: **Feb. 7, 2000**

(74) *Attorney, Agent, or Firm*—Frijouf, Rust & Pyle P.A.

(51) **LOC (7) Cl.** **24-02**

(52) **U.S. Cl.** **D24/130**

(58) **Field of Search** D24/112, 130,
D24/133; 604/164.01, 164.05, 165.3, 167,
160, 161, 523, 264

(57) **CLAIM**

The ornamental design for a handle for introducer sheath, as shown and described.

DESCRIPTION

FIG. 1 is a perspective view of my new design for a handle for introducer sheath with the sheath being shown in phantom;

FIG. 2 is a perspective view thereof, shown in severed condition;

FIG. 3 is a front view of FIG. 1;

FIG. 4 is a cross-sectional view thereof, taken along the line 4—4 of FIG. 2;

FIG. 5 is an enlarged top view thereof;

FIG. 6 is a front view thereof with the rear view being a mirror image thereof;

FIG. 7 is a bottom view thereof; and

FIG. 8 is a cross-sectional view thereof, taken along the line 8—8 of FIG. 5; and,

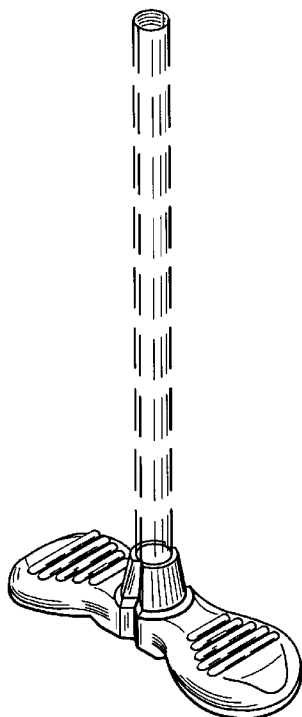
FIG. 9 is a right side view with the left view being a mirror image thereof.

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1 Claim, 4 Drawing Sheets



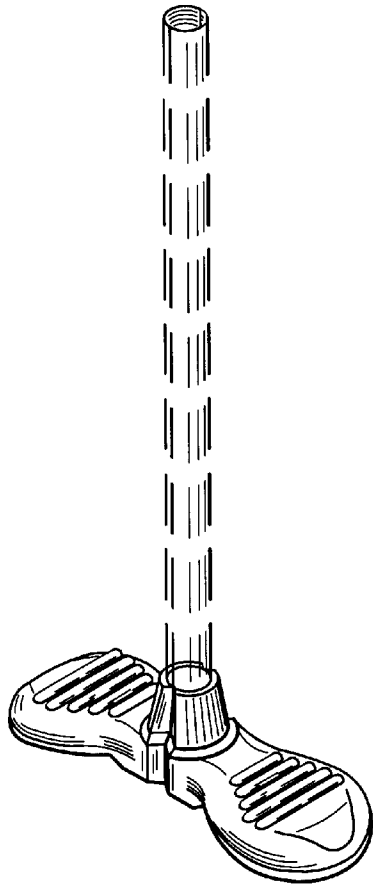


FIG. 1

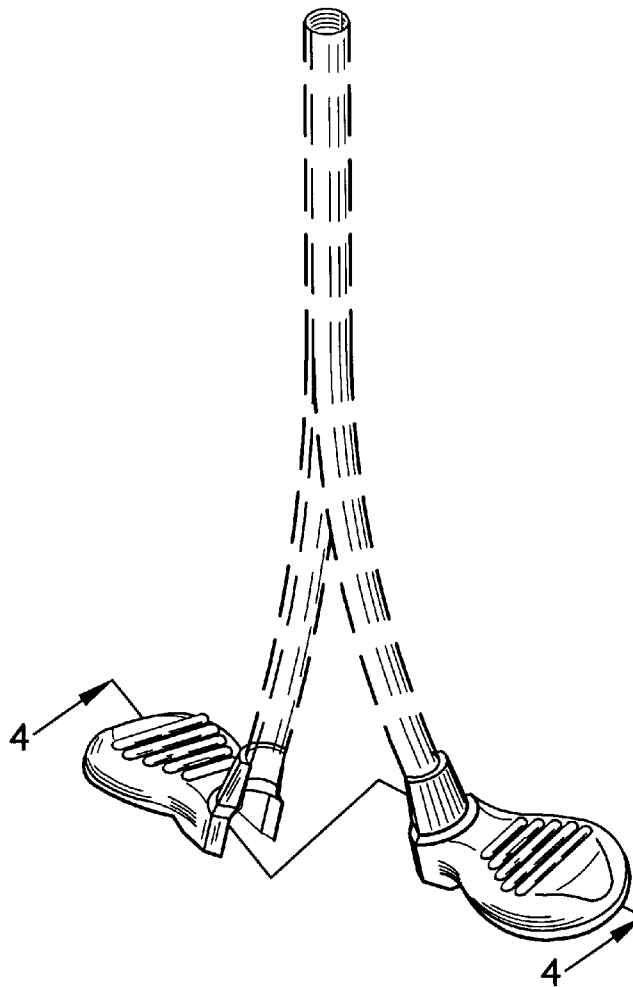


FIG. 2

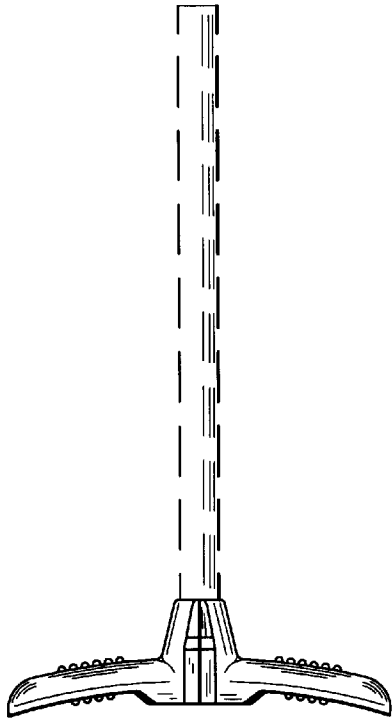


FIG. 3

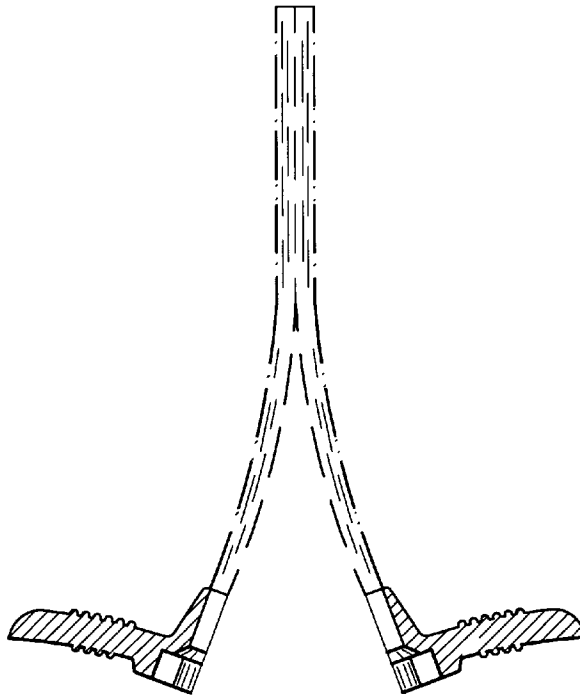


FIG. 4

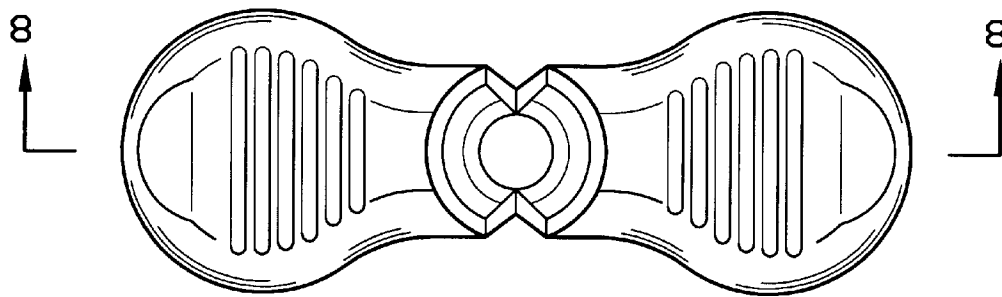


FIG. 5

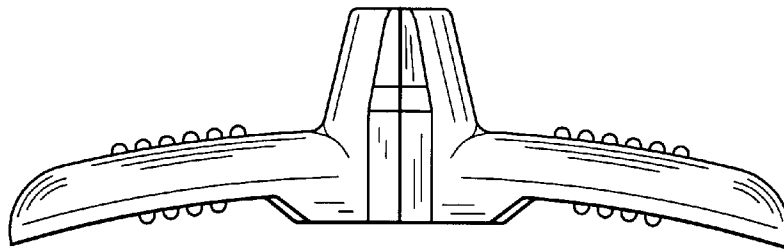


FIG. 6

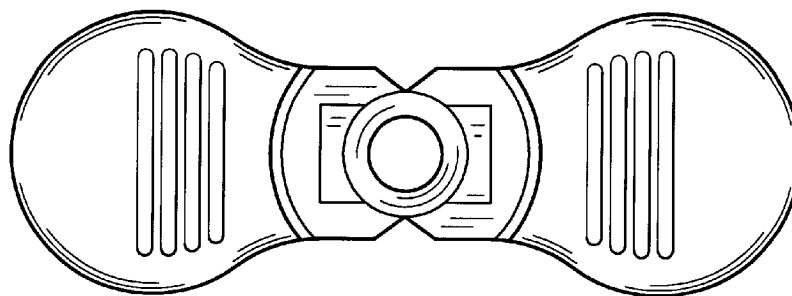


FIG. 7

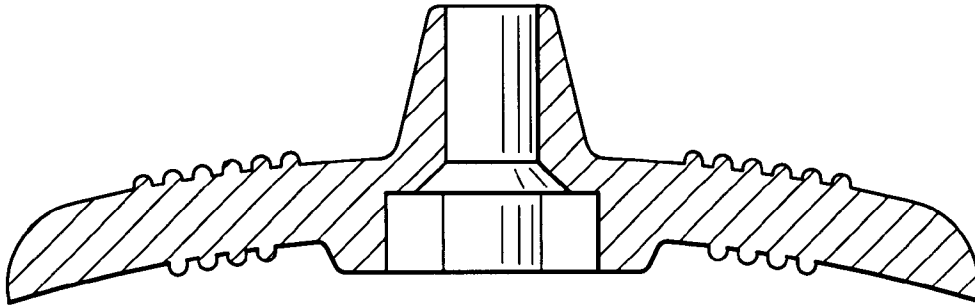


FIG. 8

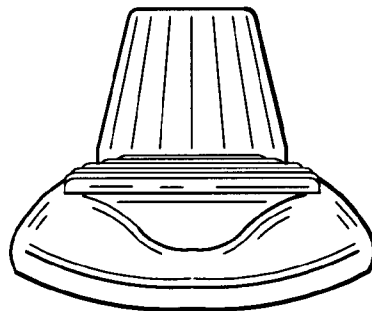


FIG. 9

HDC® Neo V-Cath® Neonatal PICC**Ordering Information**

Product Number	Detailed Product Description	Stylet	Packaged
Standard V-Cath PICC Tray			
Breakaway Needle Introducer (20 ga)			
350-00	2.0 Fr/23 ga, 40 cm, Single Lumen	None	10/cs.
350-42	2.0 Fr/23 ga, 25 cm, Single Lumen	E-Z Flush Stylet GW	10/cs.
350-40	2.0 Fr/23 ga, 40 cm, Single Lumen	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® w/ Safety Needle Introducer (2 FR)			
2012-174	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC	None	10/cs.
207-174	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
207-1725	2.0 Fr/23 ga, 25 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® OTN Sheath Introducer (2 FR)			
*350-05	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC	None	10/cs.
*352-42	2.0 Fr/23 ga, 25 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
*352-40	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
Small V-Cath PICC Tray			
Breakaway Needle Introducer (20 ga)			
350-10	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC	None	10/cs.
Mini V-Cath PICC Tray			
Breakaway Needle Introducer (20 ga)			
205-102	2.0 Fr/23 ga, 25 cm, Single Lumen V-Cath PICC	None	10/cs.
350-72	2.0 Fr/23 ga, 25 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
355-70	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® w/ Safety Needle Introducer (2 FR)			
2013-1725	2.0 Fr/23 ga, 25 cm, Single Lumen V-Cath PICC	None	10/cs.
2011-1725	2.0 Fr/23 ga, 25 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
2011-174	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® OTN Sheath Introducer (2 FR)			
204-102	2.0 Fr/23 ga, 25 cm, Single Lumen V-Cath PICC	None	10/cs.
355-72	2.0 Fr/23 ga, 25 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.
355-75	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC	E-Z Flush Stylet GW	10/cs.

* Custom Kit - by special order only.

HDC® V-Cath® PICC For Pediatric & Adult Patients**Ordering Information**

Product Number	Detailed Product Description	Stylet	Packaged
Standard V-Cath PICC Tray			
Breakaway Needle Introducer			
400-40	3.8 Fr/18 ga., 60cm, Single Lumen w/ 16ga Introducer	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® w/ Safety Needle Introducer			
207-164	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC w/ 2.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
307-166	3.0 Fr/20 ga, 60 cm, Single Lumen V-Cath PICC w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
407-166	4.0 Fr/17 ga, 60 cm, Single Lumen V-Cath PICC w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
507-266	5.0 Fr(18/18 ga), 60 cm, Dual Lumen V-Cath PICC w/ 5Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® OTN Sheath Introducer			
*352-45	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC w/ 2.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*306-166	3.0 Fr/20 ga, 60 cm, Single Lumen V-Cath PICC w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*406-166	4.0 Fr/17 ga, 60 cm, Single Lumen V-Cath PICC w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*395-60	5.0 Fr(18/18 ga), 60 cm, Dual Lumen V-Cath PICC w/ 5Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.
Small V-Cath PICC Tray			
Breakaway Needle Introducer			
400-50	3.8 Fr/18 ga, 60cm, Single Lumen w/ 16ga Introducer	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® w/ Safety Needle Introducer			
208-164	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC w/ 2.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
308-166	3.0 Fr/20 ga, 60 cm, Single Lumen V-Cath PICC w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
408-166	4.0 Fr/17 ga, 60 cm, Single Lumen V-Cath PICC w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
508-166	5.0 Fr/16 ga, 60 cm, Single Lumen V-Cath PICC w/5.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
398-266	3.9 Fr(20/20 ga), 60 cm, Dual Lumen V-Cath PICC w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
508-265	5.0 Fr(18/18 ga), 50 cm, Dual Lumen V-Cath PICC w/ 5.0 Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.
508-266	5.0 Fr(18/18 ga), 60 cm, Dual Lumen V-Cath PICC w/ 5.0 Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.
508-296	5.0 Fr(18/18 ga), 60 cm, Dual Lumen V-Cath PICC w/ Trimmable Catheter & 5.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® OTN Sheath Introducer			
*352-55	2.0 Fr/23 ga, 40 cm, Single Lumen V-Cath PICC w/ 2.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*303-166	3.0 Fr/20 ga, 60 cm, Single Lumen V-Cath PICC w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*403-166	4.0 Fr/17 ga, 60 cm, Single Lumen V-Cath PICC w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*503-166	5.0 Fr/16 ga, 60 cm, Single Lumen V-Cath PICC w/5.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*393-266	3.9 Fr(20/20 ga), 60 cm, Dual Lumen V-Cath PICC w/ 4Fr Introducer	E-Z Flush Stylet GW	10/cs.
*394-60	5.0 Fr(18/18 ga), 60 cm, Dual Lumen V-Cath PICC w/ 5Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.
*503-266	5.0 Fr(18/18 ga), 60 cm, Dual Lumen V-Cath PICC w/ Trimmable Catheter & 5.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
Mini V-Cath PICC Tray			
Safe-T-Peel® w/ Safety Needle Introducer			
3011-166	3.0 Fr/20 ga, 60 cm, Single Lumen V-Cath PICC w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
4011-166	4.0 Fr/17 ga, 60 cm, Single Lumen V-Cath PICC w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
5011-166	5.0 Fr/16 ga, 60 cm, Single Lumen V-Cath PICC w/ 5.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
5011-266	5.0 Fr(18/18 ga), 60 cm, Dual Lumen V-Cath PICC w/ 5.0 Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® OTN Sheath Introducer			
304-166	3.0 Fr/20 ga, 60 cm, Single Lumen V-Cath PICC w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
380-75	4.0 Fr/17 ga, 60 cm, Single Lumen V-Cath PICC w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
385-75	5.0 Fr/16 ga, 60 cm, Single Lumen V-Cath PICC w/ 5.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
390-76	5.0 Fr(18/18 ga), 60 cm, Dual Lumen V-Cath PICC w/ 5Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.

* Custom Kit - by special order only.

HDC® V-Cath® Midline Catheters**Ordering Information**

Product Number	Detailed Product Description	Stylet	Packaged
Small Midline Tray			
Safe-T-Peel® w/ Safety Needle Introducer			
208-162	2.0 Fr/23 ga, 20 cm, Single Lumen V-Cath Midline w/ 2.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
308-162	3.0 Fr/20 ga, 20 cm, Single Lumen V-Cath Midline w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
408-162	4.0 Fr/17 ga, 20 cm, Single Lumen V-Cath Midline w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
508-262	5.0 Fr(18/18 ga), 20 cm, Dual Lumen V-Cath Midline w/ 5.0 Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® OTN Sheath Introducer			
*350-08	2.0 Fr/23 ga, 20 cm, Single Lumen V-Cath Midline w/ 2.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*360-08	3.0 Fr/20 ga, 20 cm, Single Lumen V-Cath Midline w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*380-08	4.0 Fr/17 ga, 20 cm, Single Lumen V-Cath Midline w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
*390-08	5.0 Fr(18/18 ga), 20 cm, Dual Lumen V-Cath Midline w/ 5.0 Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.

Mini Midline Tray

Safe-T-Peel® w/ Safety Needle Introducer			
2011-162	2.0 Fr/23 ga, 20 cm, Single Lumen V-Cath Midline w/ 2.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
3011-162	3.0 Fr/20 ga, 20 cm, Single Lumen V-Cath Midline w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
4011-162	4.0 Fr/17 ga, 20 cm, Single Lumen V-Cath Midline w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
5011-262	5.0 Fr(18/18 ga), 20 cm, Dual Lumen V-Cath Midline w/ 5.0 Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.
Safe-T-Peel® OTN Sheath Introducer			
355-78	2.0 Fr/23 ga, 20 cm, Single Lumen V-Cath Midline w/ 2.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
360-78	3.0 Fr/20 ga, 20 cm, Single Lumen V-Cath Midline w/ 3.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
380-78	4.0 Fr/17 ga, 20 cm, Single Lumen V-Cath Midline w/ 4.0 Fr Introducer	E-Z Flush Stylet GW	10/cs.
390-78	5.0 Fr(18/18 ga), 20 cm, Dual Lumen V-Cath Midline w/ 5.0 Fr Introducer (staggered ends)	E-Z Flush Stylet GW	10/cs.

* Custom Kit - by special order only.

HDC® V-Cath® Accessories**Ordering Information**

Product Number	Detailed Product Description	Packaged
Breakaway Needle Introducer		
350-20	20 ga (for 2.0 Fr V-Cath)	10/cs
400-20	16 ga (for 3.8 Fr V-Cath)	10/cs
Safe-T Peel® OTN Sheath Needle Introducer		
350-25	2.0 Fr (for 2.0 Fr V-Cath)	10/cs
360-25	3.0 Fr (for 3.0 Fr V-Cath)	10/cs
380-25	4.0 Fr (for 3.9 & 4.0 Fr V-Cath)	10/cs
390-25	5.0 Fr (for 5.0 Fr V-Cath)	10/cs
Safe-T Peel® Safety Needle Introducer		
350-300	2.0 Fr (for 2.0 Fr V-Cath)	10/cs
360-300	3.0 Fr (for 3.0 Fr V-Cath)	10/cs
380-300	4.0 Fr (for 3.9 & 4.0 Fr V-Cath)	10/cs
390-300	5.0 Fr (for 5.0 Fr V-Cath)	10/cs
V-Cath Repair Kit		
350-01	2.0 Fr V-Cath Repair Kit	10/cs
360-01	3.0 Fr V-Cath Repair Kit	10/cs
380-01	4.0 & 5.0 Fr V-Cath Repair Kit	10/cs
390-01	3.9 & 5.0 Dual Lumen V-Cath Repair Kit	10/cs
400-01	3.8 Fr V-Cath Repair Kit	10/cs
Miscellaneous Accessories		
HPD	V-Lock Catheter Securement Device	40/cs
V-Wings: V-Cath Securement Suture Wings		
360-02	3.0 Fr (for 3.0 Fr V-Cath)	10/cs
380-02	4.0 Fr (for 4.0 Fr V-Cath)	10/cs
V-Cath Insertion Tray		
301-00	V-Cath Insertion Tray (for use with all V-Cath Products)	10/cs.
Catheter Exchange wires for radiology		
914-80	Catheter Exchange wires (80cm, 0.014" diameter size)	2/cs
914-130	Catheter Exchange wires (130cm, 0.014" diameter size)	2/cs

HDC® Seldinger Kits for Nurse's**Ordering Information**

Product Number	Detailed Product Description	Packaged
Nurse's Modified Seldinger Kit (to be discontinued effective July 01, 2004)		
302-166	3.0 Fr (.023" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 3.5 Fr Introducer Kit, 3.8cm & 5.7cm Nurses Seldinger Needle	10/cs.
402-166	4.0 Fr (.030" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 4.5 Fr Introducer Kit, 3.8cm & 5.7cm Nurses Seldinger Needle	10/cs.
502-166	5.0 Fr (.037" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 5.5 Fr Introducer Kit,, 3.8cm & 5.7cm Nurses Seldinger Needle	10/cs.
392-266	3.9 Fr (.020/.020" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 4.5 Fr Introducer Kit, 3.8cm & 5.7cm Nurses Seldinger Needle	10/cs.
502-266	5.0 Fr (.028/.028" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 5.5 Fr Introducer Kit, 3.8cm & 5.7cm Nurses Seldinger Needle	10/cs.
502-276	5.0 Fr (.028/.028" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 5.5 Fr Introducer Kit (w/o clamps), 3.8cm & 5.7cm Nurses Seldinger Needle	10/cs.
Nurse's Modified Seldinger Introducer Only Kits (to be discontinued effective July 01, 2004)		
302-003	3.5 Fr Introducer Kit, 3.8cm & 5.7cm Nurses Seldinger Needle	5/cs
402-003	4.5 Fr Introducer Kit, 3.8cm & 5.7cm Nurses Seldinger Needle	5/cs
502-003	5.5 Fr Introducer Kit, 3.8cm & 5.7cm Nurses Seldinger Needle	5/cs
Nurse's Modified Safety Seldinger Kit		
3029-1660	3.0 Fr (.023" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 3.5 Fr Introducer Kit, 5.7cm Nurses Seldinger Needle	10/cs.
4029-1660	4.0 Fr (.030" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 4.5 Fr Introducer Kit, 5.7cm Nurses Seldinger Needle	10/cs.
5029-1660	5.0 Fr (.037" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 5.5 Fr Introducer Kit,, 5.7cm Nurses Seldinger Needle	10/cs.
3929-2660	3.9 Fr (.020/.020" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 4.5 Fr Introducer Kit, 5.7cm Nurses Seldinger Needle	10/cs.
5029-2660	5.0 Fr (.028/.028" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 5.5 Fr Introducer Kit, 5.7cm Nurses Seldinger Needle	10/cs.
Nurse's Modified Safety Seldinger Introducer Only Kits		
3029-003	3.5 Fr Introducer Kit, 5.7cm Nurses Seldinger Needle	5/cs
4029-003	4.5 Fr Introducer Kit, 5.7cm Nurses Seldinger Needle	5/cs
5029-003	5.5 Fr Introducer Kit, 5.7cm Nurses Seldinger Needle	5/cs
Nurse's Modified Safety Needle Only		
600-004	3.5 Fr Introducer Kit, 5.7cm Nurses Seldinger Needle	10/cs

HDC® Seldinger Kits for IR/Anesthesiology**Ordering Information**

Product Number	Detailed Product Description	Packaged
Radiology/Anesthesiology Seldinger Kit		
300-166	3.0 Fr (.023" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 3.5 Fr Introducer Kit	10/cs.
400-166	4.0 Fr (.030" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 4.5 Fr Introducer Kit	10/cs.
500-166	5.0 Fr (.037" I.D.), 60 cm, Single Lumen V-Cath PICC w/ 5.5 Fr Introducer Kit	10/cs.
390-266	3.9 Fr (.020/.020" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 4.5 Fr Introducer Kit	10/cs.
500-266	5.0 Fr (.028/.028" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 5.5 Fr Introducer Kit	10/cs.
500-276	5.0 Fr (.028/.028" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 5.5 Fr Introducer Kit (w/o clamps)	10/cs.
700-266	7.0 Fr (.036/.036" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 7.5 Fr Introducer Kit	10/cs.
501-266	5.0 Fr (.028/.028" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 5.5 Fr Platinum Introducer Kit	10/cs.
701-266	7.0 Fr (.036/.036" I.D.), 60 cm, Dual Lumen V-Cath PICC w/ 7.5 Fr Platinum Introducer Kit	10/cs.
Radiology/Anesthesiology Seldinger Introducer Only Kits		
300-008	3.5 Fr Introducer Kit	5/cs
400-008	4.5 Fr Introducer Kit	5/cs
500-008	5.5 Fr Introducer Kit	5/cs
700-008	7.5 Fr Introducer Kit	5/cs
301-008	3.5 Fr Platinum Introducer Kit	5/cs
401-008	4.5 Fr Platinum Introducer Kit	5/cs
501-008	5.5 Fr Platinum Introducer Kit	5/cs
701-008	7.5 Fr Platinum Introducer Kit	5/cs

HDC® Chemo-Cath® Central Venous Access System**Ordering Information**

Product Number	Detailed Product Description		Packaged
Chemo-Cath Tray with Introducer Kit			
335-03	3.0 Fr (0.5 mm I.D.), 67 cm, Single Lumen Chemo-Cath w/ 4.0 Fr Introducer Kit		5/cs.
335-04	4.0 Fr (0.6 mm I.D.), 71 cm, Single Lumen Chemo-Cath w/ 5.0 Fr Introducer Kit		5/cs.
335-06	6.6 Fr (1.0 mm I.D.), 92 cm, Single Lumen Chemo-Cath w/ 7.0 Fr Introducer Kit		5/cs.
335-09	9.6 Fr (1.6 mm I.D.), 92 cm, Single Lumen Chemo-Cath w/ 10.5 Fr Introducer Kit		5/cs.
335-07	7.0 Fr (0.7/1.0 mm I.D.), 71 cm, Dual Lumen Chemo-Cath w/ 8.0 Fr Introducer kit		5/cs.
335-10	9.6 Fr (0.7/1.3 mm I.D.), 92 cm, Dual Lumen Chemo-Cath w/ 10.5 Fr Introducer Kit		5/cs.
335-12	12.0 Fr (1.6/1.6 mm I.D.), 92 cm, Dual Lumen Chemo-Cath w/ 13.0 Fr Introducer Kit		5/cs.
Product Number	Detailed Product Description	Recommended Intro. Kit	Packaged
Chemo-Cath Only Tray			
331-03	3.0 Fr (0.5 mm I.D.), 67 cm, Single Lumen Chemo-Cath	334-03 (4 Fr)	5/cs.
330-04	4.0 Fr (0.6 mm I.D.), 71 cm, Single Lumen Chemo-Cath	334-04 (5 Fr)	5/cs.
330-06	6.6 Fr (1.0 mm I.D.), 92 cm, Single Lumen Chemo-Cath	334-06 (7 Fr)	5/cs.
330-09	9.6 Fr (1.6 mm I.D.), 92 cm, Single Lumen Chemo-Cath	334-09 (10.5 Fr)	5/cs.
330-07	7.0 Fr (0.7/1.0 mm I.D.), 71 cm, Dual Lumen Chemo-Cath	334-07 (8 Fr)	5/cs.
330-10	9.6 Fr (0.7/1.3 mm I.D.), 92 cm, Dual Lumen Chemo-Cath	334-09 (10.5 Fr)	5/cs.
330-12	12.0 Fr (1.6/1.6 mm I.D.), 92 cm, Dual Lumen Chemo-Cath	334-12 (13 Fr)	5/cs.
Chemo-Cath Repair Kits			
330-01	6.6 Fr Chemo-Cath Repair Kit		1/ea
330-02	9.6 Fr Chemo-Cath Repair Kit		1/ea
330-03	4.0 Fr Chemo-Cath Repair Kit		1/ea
	(Repair Kits repair Only the Legs on Chemo-Cath Catheters)		

HDC® Chemo-Cath® & Chemo-Port® Accessories**Ordering Information**

Product Number	Detailed Product Description	Packaged
Universal Percutaneous Introducer Kit		
334-03	4.0 Fr Universal Percutaneous Introducer Kit	5/cs.
334-04	5.0 Fr Universal Percutaneous Introducer Kit	5/cs.
334-06	7.0 Fr Universal Percutaneous Introducer Kit	5/cs.
334-07	8.0 Fr Universal Percutaneous Introducer Kit	5/cs.
334-09	10.5 Fr Universal Percutaneous Introducer Kit	5/cs.
334-12	13.0 Fr Universal Percutaneous Introducer Kit	5/cs.
VAD Tunneler		
720-17	VAD Tunneling Instrument	10/cs

HDC® Chemo-Port® Vascular Access System**Ordering Information**

Product Number	Detailed Product Description	Recommended Intro. Kit	Attachement	Packaged
Chemo-Port Implantable - Vascular				
Standard Tintanium Chemo-Port				
700-01-11	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	334-06 (7.0 Fr)	Preattached	1/ea
700-01-15	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	334-06 (7.0 Fr)	Attachable	1/ea
700-01-12	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	334-09 (10.5 Fr)	Preattached	1/ea
700-01-16	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	334-09 (10.5 Fr)	Attachable	1/ea
Standard Delrin Chemo-Port				
700-06-11	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	334-06 (7.0 Fr)	Preattached	1/ea
700-06-15	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	334-06 (7.0 Fr)	Attachable	1/ea
700-06-12	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	334-09 (10.5 Fr)	Preattached	1/ea
700-06-16	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	334-09 (10.5 Fr)	Attachable	1/ea
Low Profile Titanium Chemo-Ports				
700-05-10	4.0 Fr (0.6 mm I.D.), 70cm, Single Lumen	334-04 (5.0 Fr)	Preattached	1/ea
700-05-11	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	334-06 (7.0 Fr)	Preattached	1/ea
700-05-15	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	334-06 (7.0 Fr)	Attachable	1/ea
700-05-12	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	334-09 (10.5 Fr)	Preattached	1/ea
700-05-16	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	334-09 (10.5 Fr)	Attachable	1/ea
Low Profile Delrin Chemo-Port				
700-08-10	4.0 Fr (0.6 mm I.D.), 70 cm, Single Lumen	334-04 (5.0 Fr)	Preattached	1/ea
700-08-11	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	334-06 (7.0 Fr)	Preattached	1/ea
700-08-15	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	334-06 (7.0 Fr)	Attachable	1/ea
700-08-12	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	334-09 (10.5 Fr)	Preattached	1/ea
700-08-16	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	334-09 (10.5 Fr)	Attachable	1/ea
Standard Dual Delrin Chemo-Port				
700-07-12	10.0 Fr (1.2 mm I.D.), 76 cm, Dual Lumen	334-09 (10.5Fr)	Preattached	1/ea
700-07-16	10.0 Fr (1.2 mm I.D.), 76 cm, Dual Lumen	334-09 (10.5Fr)	Attachable	1/ea
700-07-18	12.0 Fr (1.6 mm I.D.), 76 cm, Dual Lumen	334-12 (13.0 Fr)	Preattached	1/ea
700-07-19	12.0 Fr (1.6 mm I.D.), 76 cm, Dual Lumen	334-12 (13.0 Fr)	Attachable	1/ea
Chemo-Port Implantable - Arterial				
Standard Titanium Chemo-Port				
700-01-13	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	N/A	Preattached	1/ea
700-01-17	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	N/A	Attachable Arterial	1/ea
Low Profile Titanium Chemo-Port				
700-05-13	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	N/A	Preattached	1/ea
700-05-17	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	N/A	Attachable Arterial	1/ea
Standard Delrin Chemo-Port				
700-06-13	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	N/A	Preattached	1/ea
700-06-17	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	N/A	Attachable Arterial	1/ea

HDC® Chemo-Port® Complete Kits - Vascular Access System**Ordering Information**

Product Number	Detailed Product Description	Introducer Size	Attachement	Packaged
Chemo-Port Implantable - Vascular				
Standard Tintanium Chemo-Port with Introducer				
735-01-11	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	7.0 Fr	Preattached	1/ea
735-01-15	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	7.0 Fr	Attachable	1/ea
735-01-12	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	10.5 Fr	Preattached	1/ea
735-01-16	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	10.5 Fr	Attachable	1/ea
Standard Delrin Chemo-Port with Introducer				
735-06-11	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	7.0 Fr	Preattached	1/ea
735-06-15	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	7.0 Fr	Attachable	1/ea
735-06-12	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	10.5 Fr	Preattached	1/ea
735-06-16	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	10.5 Fr	Attachable	1/ea
Low Profile Titanium Chemo-Port with Introducer				
735-05-10	4.0 Fr (0.6 mm I.D.), 70 cm, Single Lumen	5.0 Fr	Preattached	1/ea
735-05-11	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	7.0 Fr	Preattached	1/ea
735-05-15	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	7.0 Fr	Attachable	1/ea
735-05-12	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	10.5 Fr	Preattached	1/ea
735-05-16	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	10.5 Fr	Attachable	1/ea
Low Profile Delrin Chemo-Port with Introducer				
735-08-10	4.0 Fr (0.6 mm I.D.), 70 cm, Single Lumen	5.0 Fr	Preattached	1/ea
735-08-11	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	7.0 Fr	Preattached	1/ea
735-08-15	6.6 Fr (1.0 mm I.D.), 76 cm, Single Lumen	7.0 Fr	Attachable	1/ea
735-08-12	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	10.5 Fr	Preattached	1/ea
735-08-16	9.6 Fr (1.6 mm I.D.), 76 cm, Single Lumen	10.5 Fr	Attachable	1/ea
Standard Dual Delrin Chemo-Port with Introducer				
735-07-12	10.0 Fr (1.2 mm I.D.), 76 cm, Dual Lumen	10.5 Fr	Preattached	1/ea
735-07-16	10.0 Fr (1.2 mm I.D.), 76 cm, Dual Lumen	10.5 Fr	Attachable	1/ea
735-07-18	12.0 Fr (1.6 mm I.D.), 76 cm, Dual Lumen	13.0 Fr	Preattached	1/ea
735-07-19	12.0 Fr (1.6 mm I.D.), 76 cm, Dual Lumen	13.0 Fr	Attachable	1/ea

HDC's Chemo-Cath Central Venous Access System

Ordering Information

Product Number	Detailed Product Description	Packaged
Chemo-Cath Tray with Introducer Kit		
335-03	3.0 Fr (0.5 mm I.D.), 71 cm, Single Lumen Chemo-Cath w/ 4.0 Fr Introducer Kit	5/pkg.
335-04	4.0 Fr (0.6 mm I.D.), 71 cm, Single Lumen Chemo-Cath w/ 5.0 Fr Introducer Kit	5/pkg.
335-06	6.6 Fr (1.0 mm I.D.), 92 cm, Single Lumen Chemo-Cath w/ 7.0 Fr Introducer Kit	5/pkg.
335-09	9.6 Fr (1.6 mm I.D.), 92 cm, Single Lumen Chemo-Cath w/ 11.0 Fr Introducer Kit	5/pkg.
335-07	7.0 Fr (0.7/1.0 mm I.D.), 71 cm, Dual Lumen Chemo-Cath w/ 8.0 Fr Introducer kit	5/pkg.
335-10	9.6 Fr (0.7/1.3 mm I.D.), 92 cm, Dual Lumen Chemo-Cath w/ 11.0 Fr Introducer Kit	5/pkg.
335-12	12.0 Fr (1.6/1.6 mm I.D.), 92 cm, Dual Lumen Chemo-Cath w/ 13.0 Fr Introducer Kit	5/pkg.

Product Number	Detailed Product Description	Recommended Introducer Kit	Packaged
Chemo-Cath <i>Only</i> Tray			
331-03	3.0 Fr (0.5 mm I.D.), 71 cm, Single Lumen Chemo-Cath	334-03 (4 Fr)	5/pkg.
330-04	4.0 Fr (0.6 mm I.D.), 71 cm, Single Lumen Chemo-Cath	334-04 (5 Fr)	5/pkg.
330-06	6.6 Fr (1.0 mm I.D.), 92 cm, Single Lumen Chemo-Cath	334-06 (7 Fr)	5/pkg.
330-09	9.6 Fr (1.6 mm I.D.), 92 cm, Single Lumen Chemo-Cath	334-09 (11 Fr)	5/pkg.
330-07	7.0 Fr (0.7/1.0 mm I.D.), 71 cm, Dual Lumen Chemo-Cath	334-07 (8 Fr)	5/pkg.
330-10	9.6 Fr (0.7/1.3 mm I.D.), 92 cm, Dual Lumen Chemo-Cath	334-09 (11 Fr)	5/pkg.
330-12	12.0 Fr (1.6/1.6 mm I.D.), 92 cm, Dual Lumen Chemo-Cath	334-12 (13 Fr)	5/pkg.

Chemo-Cath Tray *Only* Contents:

(1) Indicated Silicone Rubber Catheter (with Clamps)	(1) Instruction Manual
(1) Syringe w/ Needle	(1) Sterile Field
(1) Flow Clamp Per Lumen	(1) Implant Record Card
(1) Cap Per Lumen	

Chemo-Cath Repair Kits

330-01	6.6 Fr Chemo-Cath Repair Kit	1/ea
330-02	9.6 Fr Chemo-Cath Repair Kit	1/ea
330-03	4.0 Fr Chemo-Cath Repair Kit	1/ea

(Repair Kits repair **Only** the Legs on Chemo-Cath Catheters)

EXHIBIT F

HDC's Chemo-Cath & Chemo-Port Accessories

Ordering Information

<i>Product Number</i>	<i>Detailed Product Description</i>	<i>Packaged</i>
Universal Percutaneous Introducer Kit		
334-03	4.0 Fr Universal Percutaneous Introducer Kit	5/pkg.
334-04	5.0 Fr Universal Percutaneous Introducer Kit	5/pkg.
334-06	7.0 Fr Universal Percutaneous Introducer Kit	5/pkg.
334-07	8.0 Fr Universal Percutaneous Introducer Kit	5/pkg.
334-09	11.0 Fr Universal Percutaneous Introducer Kit	5/pkg.
334-12	13.0 Fr Universal Percutaneous Introducer Kit	5/pkg.

Universal Percutaneous Introducer Kit Contents:

(1) 18 ga Thin Wall Needle
 (1) J Guidewire with Holder
 (1) Sterile Field

(1) Catheter Introducer
 (1) Instruction manual
 (1) VAD Tunneling Instrument

VAD Tunneler

720-17	VAD Tunneling Instrument	10/pkg
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CERTIFICATE OF SERVICE

I hereby certify that on July 9, 2008 I electronically filed the foregoing DECLARATION OF JAMES D. PETRUZZI with the clerk of court for the U.S. District Court, Northern District of California, using the electronic case filing system of the court. The following attorneys of record for Defendant have consented in writing to accept notice as service of this document by electronic means and are being served by a "Notice of Electronic Filing" sent by the electronic case filing ("ECF") system:

[n/a].

/s James D. Petruzzi

James D. Petruzzi